

EXHIBIT B

UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

<hr/>)	
BOSTON PARENT COALITION FOR)	
ACADEMIC EXCELLENCE CORP.,)	
)	
Plaintiff,)	
)	
v.)	
)	
THE SCHOOL COMMITTEE OF THE)	Civil Action No. 1:21-cv-10330-WGY
CITY OF BOSTON, ALEXANDRA)	
OLIVER-DAVILA, MICHAEL O'NEIL,)	
HARDIN COLEMAN, LORNA RIVERA,)	
JERI ROBINSON, QUOC TRAN, ERNANI)	
DeARAUJO, and BRENDA CASSELLIUS,)	
)	
Defendants.)	
<hr/>		

DECLARATION OF BEATRIZ ABASCAL

I, Beatriz Abascal, do hereby state that the following is true to the best of my knowledge, information and belief:

1. I am the Coordinator of the Greater Boston Latino Network (GBLN), a collective of Latinx-led and Latinx-serving community-based organizations in Boston working together to address the historical underrepresentation of the Latinx community across public institutions, including Boston's highly selective public schools.
2. GBLN advocates for policies that bring new voices and leaders from the Latinx community to the table to help shape the future of Boston.
3. GBLN member organizations include the Boston Higher Education Resource Center; East Boston Ecumenical Community Council, Hyde Square Task Force, Inquilinos Boricuas en Acción (IBA), Sociedad Latina, La Alianza Hispana, Lawyers for Civil Rights, Latino STEM Alliance, and Latinos for Education.
4. GBLN's members serve thousands of Latinx families and youth annually across highly diverse Boston neighborhoods such as Dorchester, Mission Hill, Hyde Square, East Boston, and Villa Victoria in the South End.
5. A major part of GBLN's resources and programmatic work focuses on implementing strategic outreach, education, and advocacy to increase Latinx student and parent engagement in Boston Public Schools (BPS).
6. GBLN's education work is particularly critical as investigative reporting highlights the conspicuous absence of Latinx parents in BPS decision-making processes. While 42% of Boston students are Latinx, the rate of engagement and participation among Latinx parents on school site councils, in public hearings, through surveys and other decision-

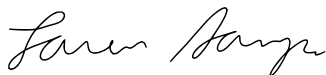
making processes hovers around zero. See “Missing At The Mic: Why Are Boston’s Latino Parents Underrepresented in School Decisions?”, WBUR available at <http://features.wgbhnews.org/missing-at-the-mic-boston-public-schools-latino-parents>.

7. To empower and support Latinx families and youth, GBLN and its member organizations dedicate significant resources and staff to providing holistic and comprehensive support services for BPS students, including award-winning academic enrichment and extracurricular programming. For example, IBA received the 2016 National Arts and Humanities Youth Program Award at the White House from First Lady Michelle Obama for its youth development program.
8. GBLN’s member, Latinos for Education, released a report in 2020 focusing on the COVID-19 pandemic’s unique impact on Latinx students and families, highlighting the issues of unequal access to technology, lost instructional time, and lack of access to digital learning resources. “*Latino Education in the Time of COVID: The Pandemic’s Unique Impact on Latino Students and Families in Massachusetts*,” Latinos for Education (Aug. 2020) available at <https://www.latinosforeducation.org/massachusetts-covid-19-impact/> (observing “substantial racial gaps” in schools’ reported GPAs between Black and Hispanic and White and Asian students, “even comparing students with similar MCAS scores”).
9. Similarly, Hyde Square Task Force, another GBLN member, works directly with Latinx, immigrant and first-generation youth in Boston neighborhoods struggling with high levels of poverty, community violence, and low-educational attainment to provide support services.
10. To raise awareness about the lack of Latinx representation in Boston’s major institutions, GBLN has commissioned and released research-based studies in partnership with the Mauricio Gastón Institute for Latino Community Development and Public Policy at the University of Massachusetts Boston, and affiliated researchers from Tufts University and other colleges.
11. For example, GBLN’s latest report confirms the critical role played by GBLN member organizations, which serve as anchor institutions and education partners “crafting and implementing the response of the Boston Public Schools in welcoming and educating arriving Puerto Rican students” in the aftermath of Hurricane Maria. “*Latinx-Led Nonprofits in Boston Today: Contributions, Challenges and Lessons Learned*” (2020) at 28 available at <https://sites.tufts.edu/jamesjennings/files/2020/10/reportsLatinx-Led-Nonprofits-2020.pdf>.
12. Since 2014, GBLN has consistently documented and reported on BPS’ alarming achievement gaps along racial lines, including exclusion from equal educational opportunities. See “*The Silent Crisis: Including Latinos and Why It Matters*” (2014) at 19 available at <http://greaterbostonlatinonetwork.org/images/thesilentcrisis.pdf> (noting “the dismal outcomes of Latino children” enrolled in BPS); see also “*The Silent Crisis II: A Follow-Up Analysis of Latino Participation in City Government Boards, Commissions, and Executive Bodies in Boston and Chelsea*” (2017) at 17 available at http://greaterbostonlatinonetwork.org/images/report_gbln_2017_web.pdf (discussing the lack of Latinx educational attainment in Boston).
13. GBLN and its members have consistently voiced concerns over the lack of access and diversity to Boston’s highly selective public schools. See “Advocating for Diversity Across BPS” available at <http://greaterbostonlatinonetwork.org/blog/20-advocating-for->

[diversity-across-bps](#) (noting that “GBLN will continue to push BPS for more outreach to Latino parents in 2017. For example, GBLN will be working to increase awareness about the Boston Latin School entrance exam and free test preparation options so that the number of Latino students at BLS more closely mirrors numbers at other BPS schools”).

14. GBLN’s advocacy and direct service work in connection with Boston’s highly selective public schools has also been the subject of significant public attention. *See* “Group Advocates Greater Inclusion For Hub Latinos,” Bay State Banner (Jan. 11, 2017) (GBLN is “advocating on behalf of Latino parents, students and teachers in the Boston Public Schools, with initiatives to increase the number of Latino students applying to the city’s exam schools”).
15. The racial disparities documented GBLN’s reports – and the direct service work led by GBLN members – are highly relevant to the remedial plan adopted by BPS in light of pandemic hardships and losses.
16. GBLN and its member organizations are providing culturally-relevant and linguistically-competent supports to Latinx parents and students to help them successfully navigate BPS, including the process of applying to selective public schools.
17. An unwavering commitment to training and placing Latinx youth and young people in leadership positions in Boston necessitates and drives GBLN’s programmatic work surrounding educational access, opportunity and excellence.
18. Inadequate and insufficient Latinx representation in Boston’s selective public schools is particularly concerning to GBLN, including affiliated organizations and their membership.

I declare under the penalty of perjury of the United States that the foregoing is correct and executed this 2nd day of March, 2021. I have authorized the attorney for GBLN, Lauren Sampson to sign on my behalf.



Lauren Sampson for Beatriz Abascal